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NSTC GREAT LAKES
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EMAIL AND THE U S NAVY RESPONSE TO THE ILLINOIS ENVIRONMENTAL PROTECTION
AGENCY COMMENTS ON THE DRAFT FINAL RECORD OF DECISION FOR SITE 5
TRANSFORMER STORAGE BONEYARD, SITE 9 CAMP MOFFETT RAVINE FILL AREA AND
SITE 21 BUILDINGS 1517/1506 AREA NSTC GREAT LAKES IL

09/25/2014
TETRA TECH

From: Davis, Robert
Sent: Thursday, September 25, 2014 3:56 PM
To: Brian Conrath (Brian.Conrath@illinois.gov)
Cc: Maritza.Montegross@navy.mil; Van Donsel, Terese A CIV NAVFAC MW, IPT; Howard Hickey; Rich, Corey
Subject: Site 5, 9, 21 ROD - Final in track change mode for your concurrence
Attachments: 1ROD Site 5, 9, 21 Final - Track changes.pdf; RTC - Sites 5 9 21 ROD epa comments.pdf

Brian – attached are the Response to the Illinois EPA Comments and the Site 5, 9, and 21 Record of Decision with changes in track change mode. Other changes that were made to the document include

- The MIDWEST logo was replaced with the MIDLANT logo throughout the document.
- In Section 1.7, Authorizing Signatures, the name may change to someone from MIDLANT. We are checking with Maritza on this at this time.
- In Section 2.1.3, Community Participation, the point of contact for information about the IR program at Naval Station Great Lakes will be changed. We are checking with Maritza on this at this time

The attached ROD will require some formatting changes and movement of figures after the changes are accepted after Illinois EPA and the blue bold text will be linked to the respective documents that are identified in the Admin Record Table at the end of the ROD to meet the requirements of the iROD or electronic ROD (the documents will be included on the CD that is included in the hard copy of the ROD).

Hard copies of the response to comments will be provided with the final signed ROD.

Bob

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**RESPONSES TO EPA COMMENTS RECEIVED JULY 24, 2014
RECORD OF DECISION FOR
SITES 5, 9, AND 21
NAVAL STATION GREAT LAKES, GREAT LAKES, ILLINOIS
Issued – September 25, 2014**

1. **Section 1.4** – The first line incorrectly references Site 19, rather than Site 9.

Response: The corrections will be made.

2. **Section 2.1.5** – On page 9, in the third paragraph, line 4, the word “bounded” should be “bound.”

Response: The corrections will be made.

3. **Sections 2.2, 2.3, and 2.4** – These sections need to provide estimates of the volume of each media to be addressed, as well as the total depth of soil contamination.

Response: A new paragraph will be added to the end of sections 2.2.3, 2.3.3, and 2.4.3, which will indicate the volume of contaminated soil and depth of soil contamination present at each site. A statement will also be added to indicate the groundwater plume is limited to the area around one well where contaminant concentrations were greater than cleanup concentrations. The text is generally (see specific changes in the ROD in track change mode):

“Approximately x,xxx cubic yard (cy) of contaminated soil is present at Site x. The contamination is present to an approximate depth of 1 to 4 feet below ground surface (bgs). The groundwater plume is limited to the area around one well where contaminant concentrations were greater than cleanup levels. Therefore, the volume of contaminated groundwater was not calculated.”

4. **Sections 2.2.7, 2.3.7, and 2.4.7** – There should be a subsection included herein to discuss the cost of the selected remedy. That discussion should include the standard cost estimate disclaimer language, which explains the potential fluctuation in actual cost upon implementation.

Response: A subsection “Cost of Selected Remedy” will be added to Sections 2.2.7, 2.3.7, and 2.4.7 which refers to Appendix C for the detailed cost estimates and includes the standard cost estimate disclaimer language. The additional text that will be added is (see specific changes in the ROD in track change mode):

“A detailed cost estimate for the Selected Remedy, Alternative x-2, for capital cost, annual cost, and present worth analysis is provided in Appendix C. The information in this cost estimate is based on the best available information regarding the anticipated scope of the Selected Remedy and implementation of the Selected Remedy at this site independent of the other two sites. Implementation of the Selected Remedy at the three sites is expected to be performed as part of a single project, so the actual cost for this site may be lower due to economies of scale. Changes in the cost elements may occur because of new information or data collected during the design and implementation of the Selected Remedy. This is an order-of-magnitude cost estimate that is expected to be within -30 to +50 percent of the actual project cost. This estimate will be refined as the remedy is designed and implemented. Even after the Selected Remedy is implemented, the total project cost is still reported as an estimate because of the uncertainty associated with annual O&M expenditures.”

5. **Section 2.3.1** – It states here that the area of the former ravines was approximately 1.5 acres. The total acreage of Site 9 should be provided here as well. Part of the remedy is the groundwater use restriction that encompasses the entire site, not just the former ravines.

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Response: The total acreage for Site 9, which is approximately 21 acres, will be added to Section 2.3.1.

6. **Table 2-15 and Section 2.4.7.2** – In both locations it is stated that, for the selected remedy, approximately 2000 square feet in the northwest corner of the site will need to be further evaluated to determine if any action is needed. This was not discussed in the Proposed Plan. Please confirm this action is necessary and, if so, provide additional information on how and when that evaluation will take place.

Response: The details for this part of the selected remedy were mistakenly left out of the Proposed Plan. The surface soil sample (SB-03) in the subject area has a few PAH detections that were greater than the cleanup levels based on background concentrations. The text will be modified to indicate that the appropriate remedial action will be identified in the remedial action work plan and the remedial action work plan will be developed for placement of a barrier over this limited area or excavation of the contaminated soil for this limited area. The following text will be added to the second paragraph in Section 2.4.7.2

“...the appropriate remedial action, such as a barrier (soil, asphalt, etc.) or excavation. This area had a surface soil sample with PAH concentrations greater than soil cleanup levels based on background values. The specific remedial action will be identified in the remedial action work plan.”

7. **Administrative Record Reference Table** – The word “Table” in the title of the Detailed Administrative Record Reference Table is misspelled.

Response: The corrections will be made.

8. **Appendix B** – The State action-specific ARARs listed in Table B-3 do not correspond with those listed in the Feasibility Study (FS). The key ARARs associated with each alternative should be presented here. Please justify this change or revise the table to match the FS.

Response: The draft table was inadvertently used in the submittal. Table B-3 was replaced with the state action-specific ARARs presented in the FFS.

9. **Appendix C** – The cost estimates provided here are for the selected remedy for each site only. Suggest providing cost estimates for all of the evaluated alternatives for comparison or at least providing a statement that the other cost estimates can be found in the FS.

Response: A statement will be added to Sections 2.2.5, 2.3.5, and 2.4.5 under the Primary Balancing Criteria for Cost that “Detailed cost estimates for each alternative are presented in the FFS (Tetra Tech, 2013c).”